BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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MAILING ONLINE SERVICE)	Docket No. MC98-1

FIRST INTERROGATORIES OF MAIL ADVERTISING SERVICE ASSOCIATION INTERNATIONAL TO USPS WITNESS STIREWALT (MASA/USPS-T3-1-7)

In accordance with Order No. 1216 of the Postal Rate Commission, the witness is requested to provide written responses to the following interrogatories within 10 days of the date hereof. For purposes of these interrogatories, "MOL" refers to the Mailing Online Service that is the subject of these proceedings.

MASA/USPS-T3-1. Does the Postal Service cost estimate include any costs associated with marketing MOL? If so, identify the costs associated with marketing and state the basis for the cost estimates. If not, explain fully why such costs have not been included in cost estimates for MOL.

MASA/USPS-T3-2. Describe in detail the marketing efforts the Postal Service plans to employ with respect to MOL. If the marketing effort is expected to change in nature or extent over the initial five year period of the service, explain the expected changes.

MASA/USPS-T3-3. Describe in detail the nature and extent of customer services expected by the Postal Service with respect to assisting MOL users in the procedures and technical details necessary to use MOL.

MASA/USPS-T3-4. Confirm that all costs associated with customer service have been estimated in the category "Technical Help Desk." If you cannot confirm, explain in detail why not and include an identification of all costs associated with customer service.

MASA/USPS-T3-5. Confirm that for the two year period during which the experimental classification for MOL is proposed to be in effect:

(a) the total personnel cost estimated in the cost category Technical Help Desk is

1999 282,000 2000 282,000

(b) the total number of users of MOL is estimated to be

1999 5,981 2000 10,439

(c) "users" as used in LR-1, Attachment 1, does not include potential customers who make inquiry about MOL, but do not end up utilizing the service.

Explain why Technical Help Desk costs for 1999 and 2000 are the same while the number of users is estimated to increase.

MASA/USPS-T3-6.

- (a) Confirm that the Postal Service estimates that it will be necessary to assign 4 employees to functions in the Technical Cost Desk cost category during 1999 and 2000. If you are unable to confirm, explain fully.
- (b) Describe in detail all job functions to be performed by personnel in the Technical Help Desk cost category.
- (c) Confirm that personnel assigned to perform job functions in the Technical Help Desk cost category will not perform job functions in any other cost category. If you are unable to confirm, explain fully.

MASA/USPS-T3-7. For purposes of this interrogatory, reference is made to LR-1, Attachment 1, page 11, under the heading "Technical Help Desk Resource Years."

- (a) Define the following terms: (i) Help Desk Resource Years; (ii) First Time Call Hours; and (iii) On-going calls hours.
- (b) Confirm that the "Total Call Hours" line is derived as the sum of Total First Time Call Hours and Total On-going Call Hours, not the product of those two numbers as reflected in the source column. If you cannot confirm, explain fully.
- (c) Explain fully the difference in the way you have treated "Total Call Hours" and "Technical Help Desk Call Hours" for purposes of your cost estimates.
- (d) Explain fully the methodology you have used to estimate "Total First Time Call Hours" and "Total On-going Call Hours." Include in your answer a full description of the "experience during operational test" relied upon in making your estimate.

(e) With respect to the line "percentage of customer calls requiring technical help," describe fully the "experience during the pilot" referred to in the source column. Explain fully what percentage is indicated by that experience and why you used a "lower" percentage.

Respectfully Submitted,

Graeme W. Bush, Esq. James Sottile, IV, Esq.

CAPLIN & DRYSDALE, CHARTERED

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Counsel for Mail Advertising Service Association International

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing interrogatories were served by first class mail on the parties on the attached service list this 6th day of August 1998.

James Sottile, IV

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